

**United States Bankruptcy Court  
Eastern District of Pennsylvania**

In re **Aleksandr Zaks  
Gelena Zaks**

Debtor(s)

Case No. **14-12022**  
Chapter **13**

**MOTION TO MODIFY CHAPTER 13 PLAN CASE POST-CONFIRMATION AND AUTHORIZATION FOR  
DISTRIBUTION OF SETTLEMENT FUNDS**

Debtor, Aleksandr Zaks, does hereby file this Motion to Modify his Chapter 13 Bankruptcy case post-confirmation and Authorization for Distribution of Settlement Funds and is support thereof states as follows:

1. On March 19, 2014 Debtor filed this Chapter 13 Bankruptcy case.
2. During the duration of this Bankruptcy case, debtor suffered personal injuries as a result of a work related injury, whereby there was a third-party claim made by debtor.
3. Debtor paid his plan payments, however, on or about May 29, 2019, debtor was offered a settlement for his personal injuries in the amount of \$140,000. (See Exhibit "A")
4. As a result of obtaining said settlement, debtor must pay the unsecured creditors an additional \$4,955.36, this is the difference between the total amount of unsecured claims \$11,426.08 and the amount debtor has already paid into the plan \$6,470.72.
5. Debtor requests that his current Chapter 13 Plan be modified to include the additional \$4,995.36 and that the \$4,995.36 be paid directly from said settlement funds to the Trustee through his personal injury attorney, Doulgas Milch, Esquire, located at Wingate Russotti, Shapiro & Halperin, 420 Lexington Avenue Suite 2750, New York, NY 10170.
6. Debtor's counsel, Tova Weiss, intends to file an Amended Plan to include the \$4,995.36 additional funds upon the Court's approval of this Motion to Modify.
7. After debtor pays the additional \$4,995.36 to the plan , by and through his attorney, Douglas Milch, the remainder of the net settlement funds to debtor can be released to debtor by Attorney Milch.

WHEREFORE, debtor, Aleksandr Zaks, respectfully requests that this Honorable Court Grant this Motion Modify his Chapter 13 Plan post-Confirmation and Authorize Distribution of Settlement Funds in accordance with the attached proposed Order.

Respectfully submitted,

/s/Tova Weiss  
Tova Weiss  
648 2<sup>nd</sup> Street Pike  
Southampton, PA 18966  
Attorney for Debtor

Date: June 28, 2019

